

United States District Court  
for the  
Southern District of New York  
Related Case Statement

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Full Caption of Later Filed Case:

EM Ltd.

Plaintiff

Case Number

vs.

The Republic of Argentina

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

NML Capital, Ltd.

v.

The Republic of Argentina

Nos. 08 CV 6978 (TPG), 09 CV 1707 (TPG), 09 CV 1708 (TPG)

Lightwater Corporation Limited

v.

The Republic of Argentina

No. 14 CV 4092 (TPG)

EM Ltd.

v.

The Republic of Argentina

No. 03 CV 2507 (TPG)

IH-32

Rev: 2014-1

## Status of Earlier Filed Case:

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Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The NML and Lightwater cases are open; the EM case is closed. See below.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This case seeks specific performance of Argentina's payment obligations pursuant to the equal treatment (pari passu) provision of bond instruments on which Argentina defaulted, together with related injunctive relief.

NML Capital Ltd. v. The Republic of Argentina, Nos. 08 CV 6978 (TPG), 09 CV 1707 (TPG), and 09 CV 1708 (TPG), is a case in which another creditor of Argentina sought similar specific performance and injunctive relief under the same equal treatment provision of the same series of bond instruments. Judge Griesa granted partial summary judgment and injunctive relief for the plaintiff.

Lightwater Corporation Limited v. The Republic of Argentina, No. 14 CV 4092 (TPG), is a recently filed case in which another post-judgment creditor of Argentina is seeking similar relief under the equal treatment provision. Judge Griesa has accepted it as a related case to the NML case cited above.

EM Ltd. v. The Republic of Argentina, 03 CV 2507 (TPG), is a case in which plaintiff obtained a money judgment as a result of defendant's failure to pay interest and principal due in connection with bonds issued by defendant Argentina, on which it had defaulted.

A number of other similar cases against Argentina, not specifically listed above, also have been assigned to Judge Griesa, including some that have been identified as related cases to the above-mentioned cases.

Signature:



Date:

10/16/14

Firm:

LAW OFFICES OF CHARLES PLATTO